

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Luis Perales) Chapter 13
Cynthia Perales) Case No. 19 B 02618
Debtor(s)) Judge Timothy A Barnes

Notice of Motion

Luis Perales
Cynthia Perales
4458 S Sawyer Ave
Chicago, IL 60632

Debtor Attorney: Sulaiman Law Group Ltd
via Clerk's ECF noticing procedures

On April 18, 2019 at 10:30 am, I will appear at the location listed to the right, and present this motion.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Thursday, April 11, 2019.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 744
> Chicago, IL 60604

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 01/31/2019.
2. The debtor(s) have failed to provide an Affidavit of Compliance.
3. The debtor(s) have failed to provide copies of all payment advices or other evidence of payment received within 60 days before the date of filing the petition.
4. The debtor(s) have failed to resolve the pending objection(s) to the plan.
5. The debtor(s) have failed to commit all disposable income to the plan.
6. The debtors have failed to amend schedule I to list their income from UBER.
7. The debtors have failed to amend schedule J to correctly list their rent and auto insurance expenses.
8. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE